

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE**

TIMOTHY BOND,

Lead Plaintiff

and

JEAN-NICOLAS TREMBLAY,

Named Plaintiff,

Individually and on Behalf of All Others Similarly  
Situated,

v.

CLOVER HEALTH INVESTMENTS, CORP.  
f/k/a SOCIAL CAPITAL HEDOSOPHIA  
HOLDINGS CORP. III, VIVEK GARIPALLI,  
ANDREW TOY, JOE WAGNER, and  
CHAMATH PALIHAPITIYA,

Defendants.

Case No. 3:21-cv-00096

Judge Aleta A. Trauger

**JOINT MOTION FOR LIMITED AMENDMENT TO  
INITIAL CASE MANAGEMENT ORDER**

Pursuant to Federal Rule of Civil Procedure 6(b), Local Rule 6.01(a) and Section III(B) of the Court's Practice and Procedure Manual, the Parties respectfully request that the Initial Case Management Order (Doc. 97) and subsequent Order (Doc. 100) be modified to extend: (i) Defendants' deadline to file their opposition to class certification from September 9, 2022, to September 30, 2022; and (ii) Plaintiffs' deadline to file a reply in further support of their motion for class certification from October 10, 2022, to October 31, 2022.

In support of this Motion, the Parties state as follows:

1. “The district court has broad discretion to enlarge the time for any action.”  
*Jarrett v. Toxic Action Wash*, No. 95-3702, 1996 WL 690160, \*1 (6th Cir. Nov. 27, 1996) (citing Fed. R. Civ. P. 6(b)).
2. There is good cause to grant the requested extension in that, despite the Parties diligent efforts, they will not be able to complete discovery necessary for the class certification briefing before September 9, 2022, and the requested extension will not delay the action or affect any other deadlines.
3. This Motion is made in good faith and not for the purpose of delay.

For the foregoing reasons, the Parties respectfully request that the Court grant their Motion.

A proposed order is submitted herewith.

Dated: August 25, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed electronically on August 25, 2022. Notice of this filing will be sent to all electronically registered parties by operation of the Court's electronic filing system. The names of the attorneys for other parties who are registered to receive notices of filings through the Court's system are:

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